

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Shellany Ray,

Plaintiff,

v.

**Recovery Healthcare Corporation and
Alcohol Monitoring Systems, Inc.**

Defendants

Case No. 3:19-cv-03055-G

PLAINTIFF'S UNOPPOSED MOTION FOR STAY

NOW COMES Shellany Ray, the Plaintiff, moving the Court to stay the proceedings in this case for 45 days. The undersigned counsel, Ty Clevenger, has gradually been withdrawing from a prescription medication since May, and at times he has experienced severe withdrawal symptoms.¹ *See* August 10, 2020 Letter from Jianne Lo to The Hon. Catherine D. Purcell (Exhibit 1). The symptoms were particularly bad last week and continued through the weekend. Yesterday, Plaintiff's Counsel consulted with his medical provider and decided to enter an intensive outpatient program on September 2, 2020. The program is expected to last 3-4 weeks, therefore the Plaintiff moves the Court to stay proceedings in this case for 45 days. The Plaintiff's amended pleadings are due on September 3, 2020, and the Plaintiff moves the Court to stay that

¹ As witnessed by his electronic signature on this document, Ty Clevenger declares under penalty of perjury under the laws of the United States that his statements in this motion are true and correct.

deadline as well insofar as Plaintiff's Counsel was unable to work on them last week. Plaintiff's Counsel conferred with counsel for all of the Defendants via email, and the Defendants do not oppose this request for a stay.

Respectfully submitted,

/s/ Ty Clevenger

Ty Clevenger
Texas Bar No. 24034380
P.O. Box 20753
Brooklyn, New York 11202-0753
(979) 985-5289
(979) 530-9523 (fax)
tyclevenger@yahoo.com

Attorneys for Plaintiff Shellany Ray

CERTIFICATE OF SERVICE

I certify that I conferred with counsel for the Defendants via email, and they do not oppose this motion.

/s/ Ty Clevenger

Ty Clevenger

CERTIFICATE OF SERVICE

I certify that a copy of this document was filed electronically with the Court's ECF system on September 1, 2020, which should result in automatic notification to all counsel of record.

/s/ Ty Clevenger

Ty Clevenger